

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Marc E. Hirschfield
Terry Brennan

*Attorneys for Irving H. Picard, Esq., Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

IRWIN LIPKIN, *et al.*,

Defendants.

Adv. Pro. No. 10-04218 (SMB)

STIPULATION FOR EXTENSION OF TIME TO RESPOND

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which Defendants Eric Lipkin, Erika Lipkin, individually, and in her capacity as Custodian UGMA/NJ for [C.L.], [D.L.] and [S.L.]; [C.L.], by and through Erika Lipkin, parent and Custodian; [D.L.], by and through Erika Lipkin, parent and Custodian, and [S.L.], by and through Erika Lipkin, parent and Custodian may move, answer or otherwise respond to the Complaint is extended from November 24, 2014 up to and including March 25, 2015.

The purpose of this stipulated extension is to provide additional time for Defendants to answer, move against, or otherwise respond to the Complaint. This is the forty-first such extension for Defendants Eric Lipkin and Erika Lipkin, individually, and in her capacity as parent and Custodian of [C.L.], [D.L.] and [S.L.]. Nothing in this stipulation is a waiver of the Defendants' right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee's right to object to any such request.

Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental Authority To Stipulate To Extensions Of Time To Respond And Adjourn Pre-Trial Conferences (ECF No. 8762) in the above-captioned case (No. 08-01789 (SMB)).

Dated: January 16, 2015

BAKER & HOSTETLER LLP

By: /s/ Marc E. Hirschfield
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Marc E. Hirschfield
Email: mhirschfield@bakerlaw.com
Terry Brennan
Email: tbrennan@bakerlaw.com

*Attorneys for Plaintiff Irving R. Picard, Trustee for
the Liquidation of Bernard L. Madoff Investment
Securities LLC*

JAMES K. FILAN

By: /s/ James K. Filan
315 Post Road West
Westport, Connecticut 06880
Telephone: (203) 557-9159
Facsimile: (203) 341-8560
James K. Filan
Email: jfilan@jamesfilan.com

Attorney for Defendant Eric Lipkin

FINN DIXON & HERLING LLP

By: /s/ Tony Miodonka
Finn Dixon & Herling LLP
177 Broad Street
15th Floor
Stamford, CT 06901
(203) 325-5000
Fax : (203) 325-5001
Email: tmiodonka@fdh.com
Email: apavlis@fdh.com

*Attorneys for Defendants Erika Lipkin, individually,
and in her capacity as Custodian UGMA/NJ for
[C.L.], [D.L.] and [S.L.]; [C.L.], by and through
Erika Lipkin, parent and Custodian; [D.L.], by and
through Erika Lipkin, parent and Custodian; and
[S.L.], by and through Erika Lipkin, parent and
Custodian*